

MORRIS LAW GROUP
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
801 S Rancho Dr., Suite B4
Las Vegas, Nevada 89106
Telephone: (702) 474-9400
Facsimile: (702) 474-9422
Email: sm@morrislawgroup.com
Email: rsr@morrislawgroup.com

VerisLaw, PLLC
Michael S. Alfred (*pro hac vice*)
6508 Colleyville Blvd., Suite 100
Colleyville, Texas 76034
Telephone: (817) 678-4121
Facsimile: (512) 717-7230
Email: malfred@verislaw.net

Attorneys for Defendant

SUSTAINABLE MODULAR MANAGEMENT, INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation)	Case No. 2:20-cv-00790-GMN-NJK
<i>Plaintiff,</i>)	JOINT STIPULATION TO EXTEND
v.)	BY ONE WEEK THE DEADLINE FOR
)	RESPONDING TO THE RESPECTIVE
)	MOTIONS FOR PARTIAL-SUMMARY
JE DUNN CONSTRUCTION COMPANY, <i>et al.</i> ,)	JUDGMENT FILED BY PLAINTIFFS
<i>Defendants.</i>)	AND DEFENDANTS
)	(SECOND REQUEST)

Plaintiff, UNITED STATES OF AMERICA, for the use and benefit of Sustainable Modular Management, Inc. ("SMM" or "Plaintiff"), and Defendant/Counterclaimant, JE Dunn Construction Company, Federal Insurance Company, Hartford Fire Insurance Company, and Defendants Travelers Casualty and Surety Company of America ("Defendants") file this Stipulation to Extend by one week the deadline to respond to their

1 respective Motions for Partial Summary Judgment, and in support thereof, respectfully state
2 as follows:

3 **RECITALS**

4 1. The Court's Order extending the deadlines in the Discovery Plan and
5 Scheduling Order [Dkt. 95] reset the deadline to June 30, 2023 for the parties to file
6 dispositive motions.

7 2. Consistent with the Court's Order, both Defendants and Plaintiff filed their
8 respective Motions for Partial Summary Judgment on June 30, 2023 [Dkt. 103] and
9 [Dkt. 106], respectively, (collectively, the "MPSJs").

10 3. On July 20, 2023, the Parties filed their Stipulation for Extension of Time for
11 One Week to Respond to the MPSJs (First Request) [110] (the "Stipulation"). That same
12 day, the Court granted the extension of time to July 28, 2023 for the parties to respond to
13 the respective MPSJs [Dkt. 112].

14 4. This is the second stipulation for an extension of time presented by the
15 parties to respond to the MPSJs. This request is for a one-week extension until and including
16 August 4, 2023. The parties do not anticipate requesting any further extensions.

17 5. When the first stipulation was submitted on July 20, 2023, the parties
18 believed a one-week extension would be sufficient. However, while continuing to work
19 diligently on their responses, it has become apparent that an additional week is necessary to
20 properly and fairly complete their response briefs given the complexity of the legal issues
21 presented and the voluminous factual record that includes multiple appendices (for
22 example, one declaration in the summary-judgment record is twelve pages and eighty-two
23 paragraphs in length).

24 6. This stipulation is filed before the July 28, 2023 deadline consistent with
25 Local Rule IA -6.1, and is further submitted in good faith and not intended to cause delay.

26 7. Consistent with Local Rule IA 6-2, SMM and JE Dunn respectfully request
27 that the Court extend the time for to respond the MPSJs until and including August 4, 2023.

28 DATED this 27th day of July, 2023.

MORRIS LAW GROUP

By: /s/ Michael S. Alfred
Steve Morris, Bar No. 1543
Rosa Solis-Rainey, Bar No. 7921
801 S Rancho Drive, Suite B4
Las Vegas, Nevada 89106

Michael S. Alfred (*pro hac vice*)
Texas State Bar No. 24014416
VerisLaw, PLLC
6508 Colleyville Blvd., Suite 100
Colleyville, Texas
(817) 678-4121 telephone
(512) 717-7230 fax
malfred@verislaw.net

*Attorneys for Plaintiff
Sustainable Modular Management, Inc.*

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Robert F. Roos
Robert F. Roos (*pro hac vice*)
Arizona Bar No. 9915
Adrienne Brantley-Lomeli, Bar No. 14486
3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

*Attorneys for Defendants
JE Dunn Construction Company, Federal
Insurance Company, Hartford Fire Insurance
Company, and Defendants Travelers Casualty
and Surety Company of America*

ORDER

IT IS SO ORDERED.



United States District Judge

DATED July 27, 2023

CERTIFICATE OF SERVICE

Fed. R. Civ. P. 5(b) and Section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of VERISLAW, PLLC, and that the following document was served on all counsel of record via electronic service **STIPULATION TO EXTEND SUSTAINABLE MODULAR MANAGEMENT, INC.'S AND JE DUNN'S TIME TO RESPOND TO MOTIONS FOR PARTIAL SUMMARY JUDGMENT (SECOND REQUEST).**

Dated this 27th day of July, 2023.

By: /s/ Edye Buxbaum

An Employee of VerisLaw